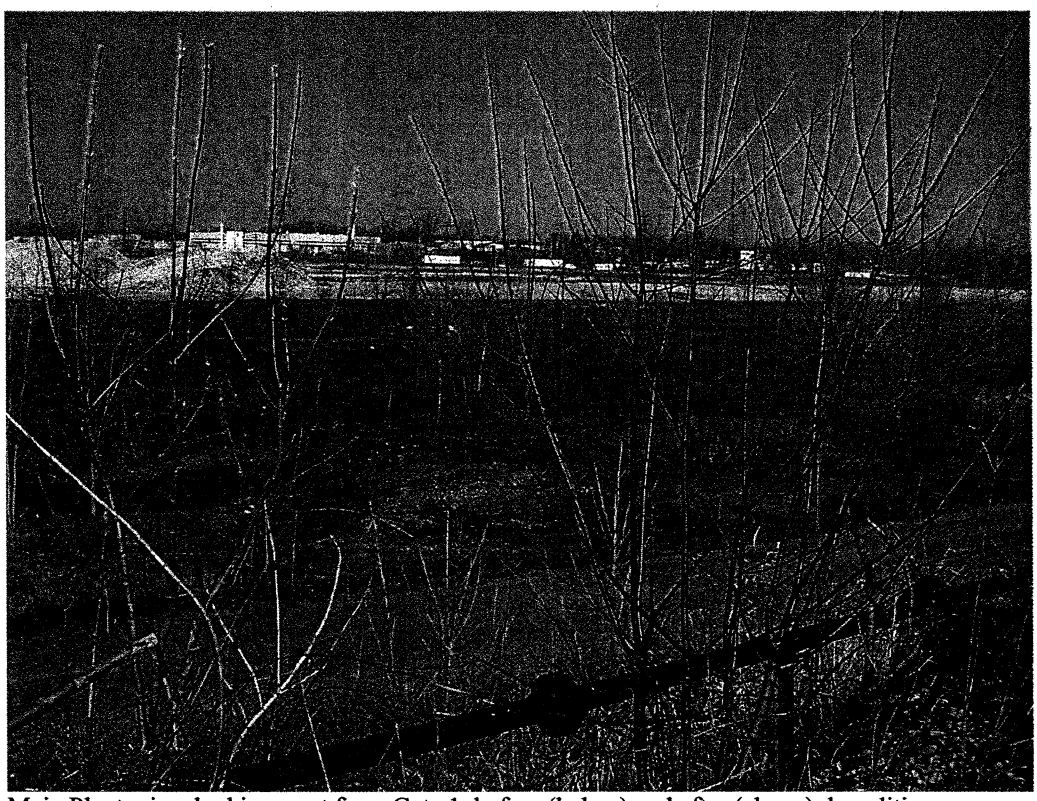
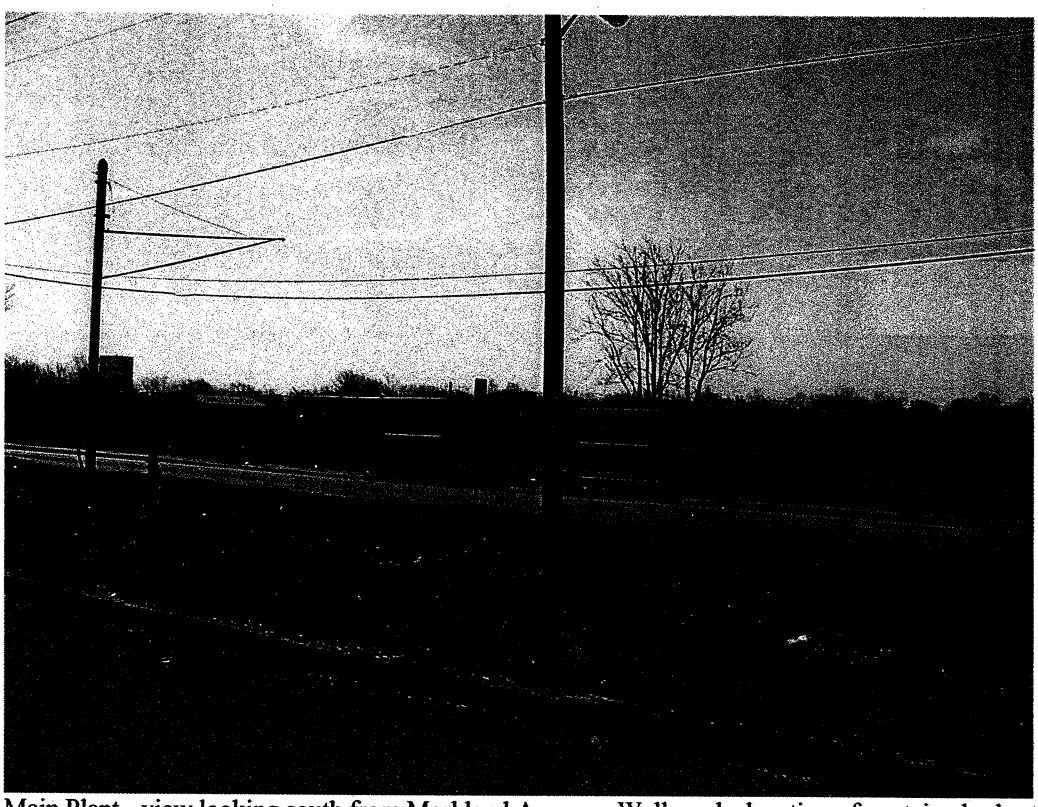
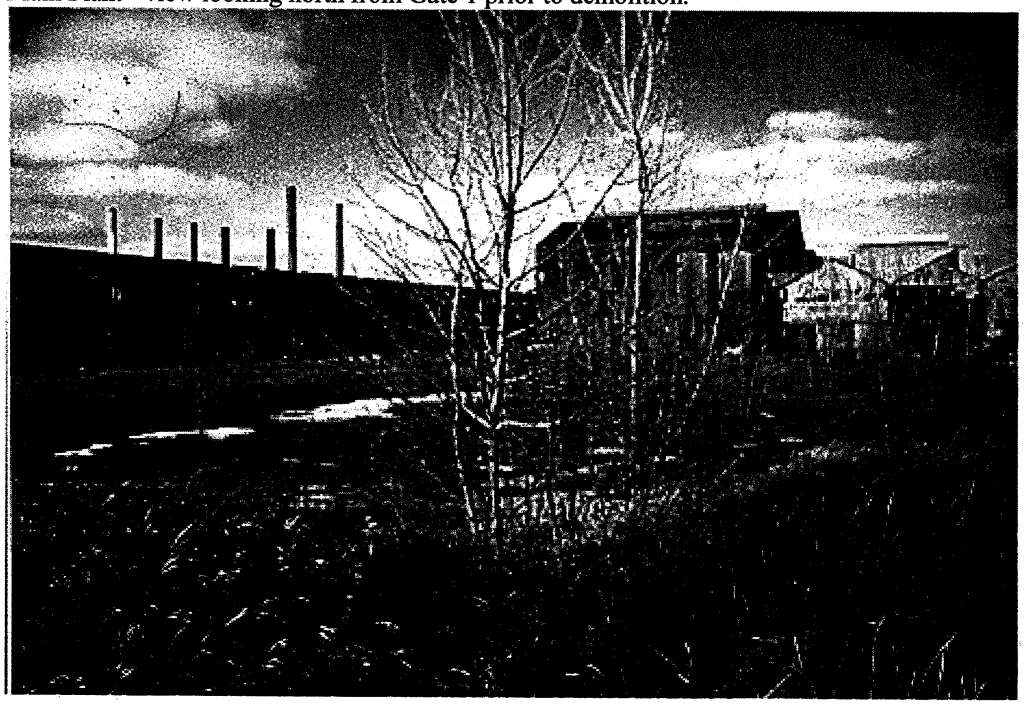


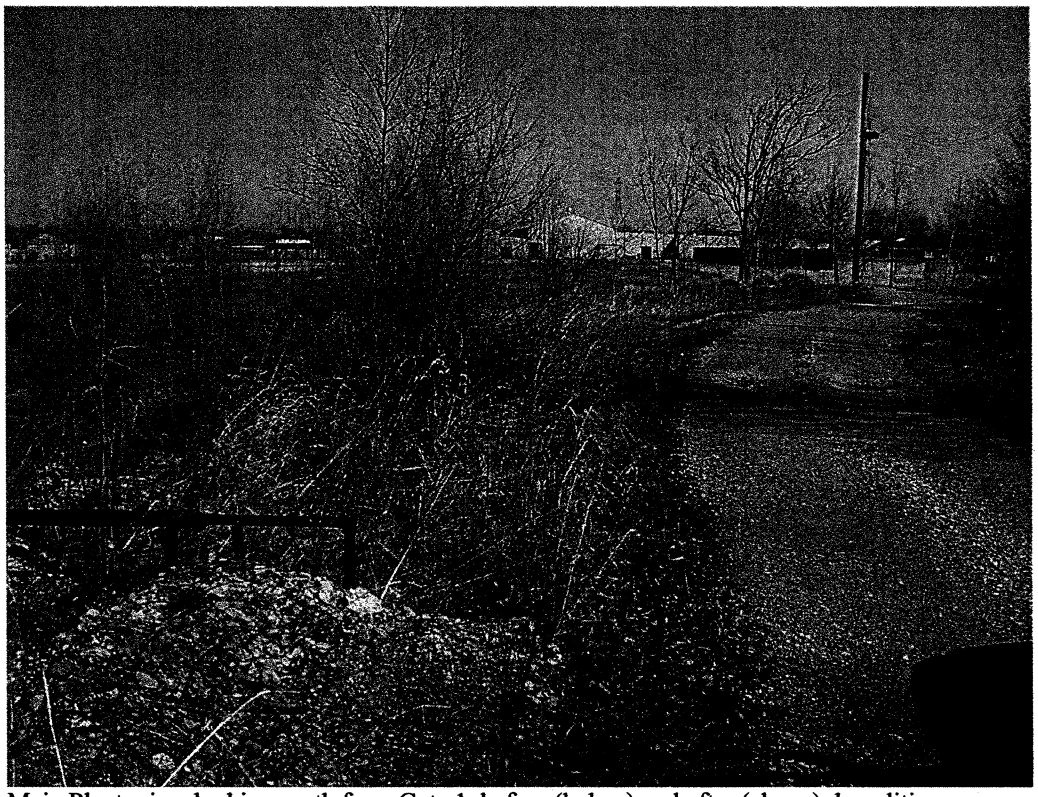
Main Plant, view looking west from Gate 1, before (below) and after (above) demolition.



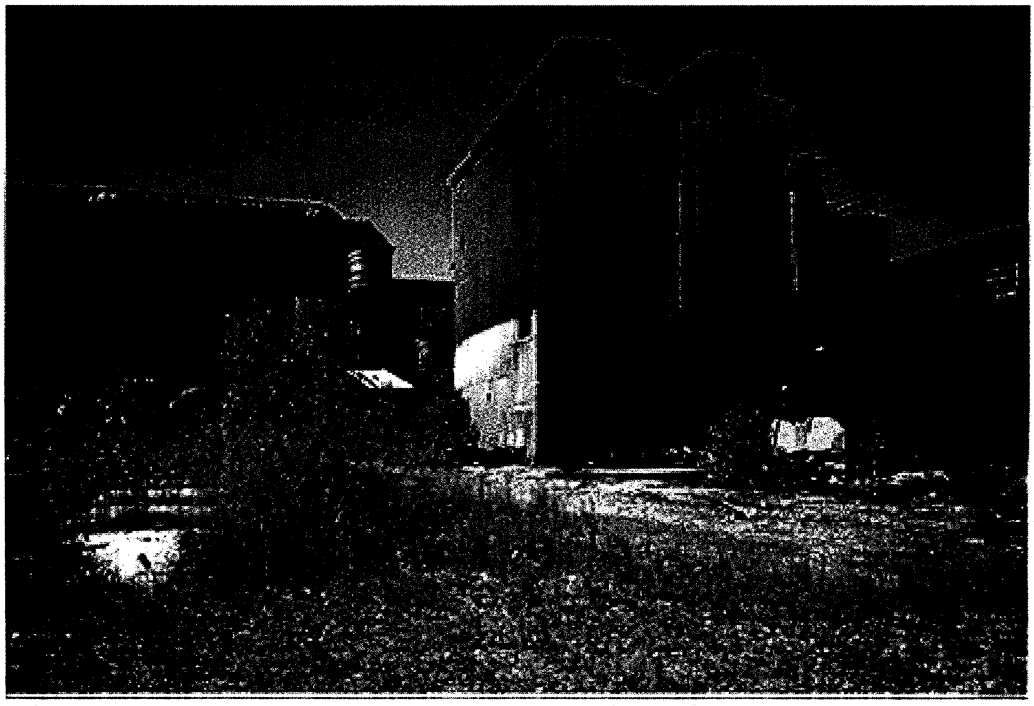
Main Plant - view looking south from Markland Avenue. Wall marks location of contained asbestos.

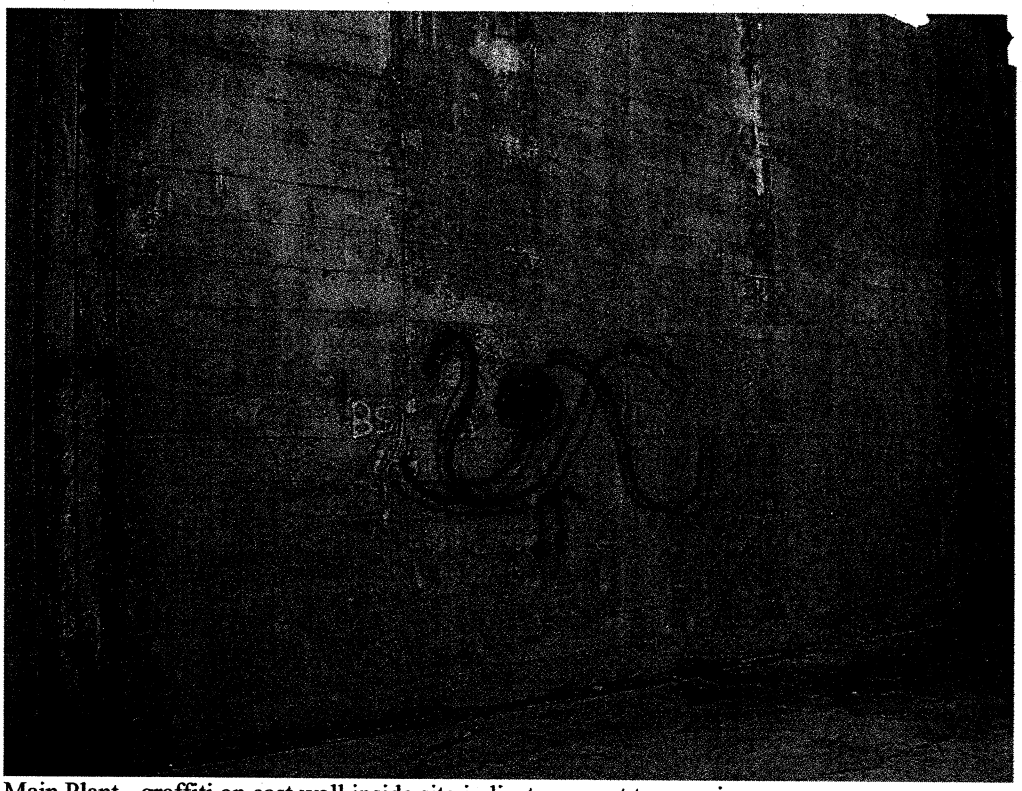
Main Plant - view looking north from Gate 1 prior to demolition.





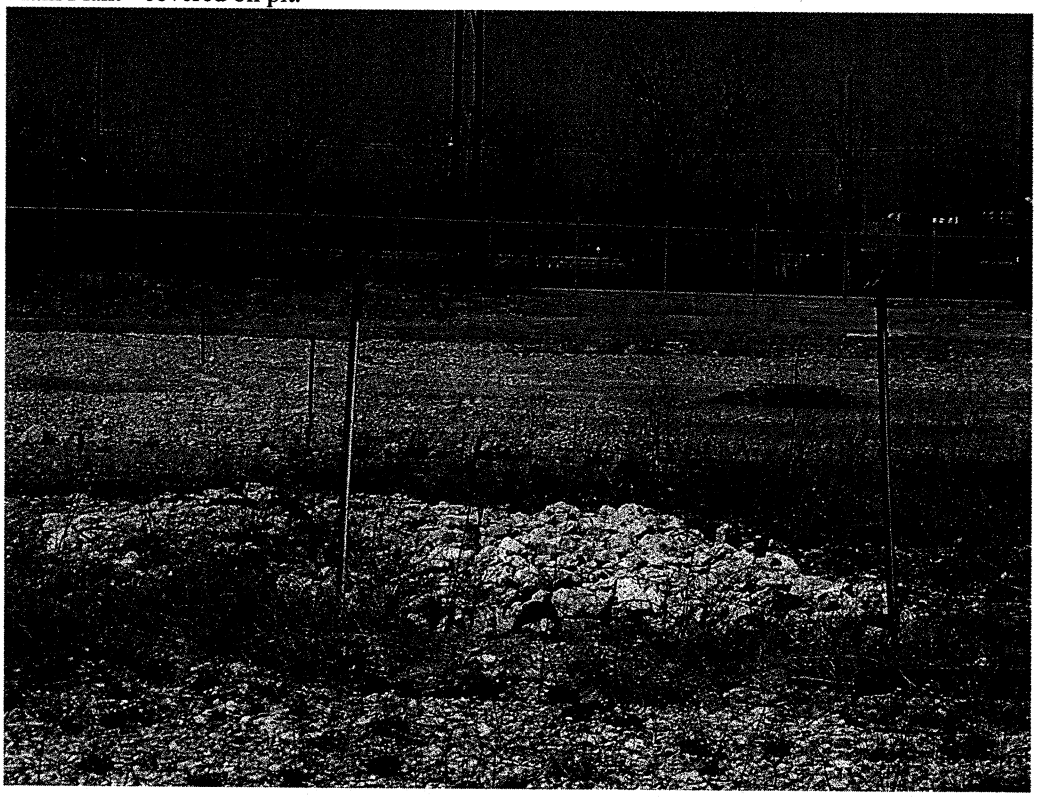
Main Plant, view looking north from Gate 1, before (below) and after (above) demolition.

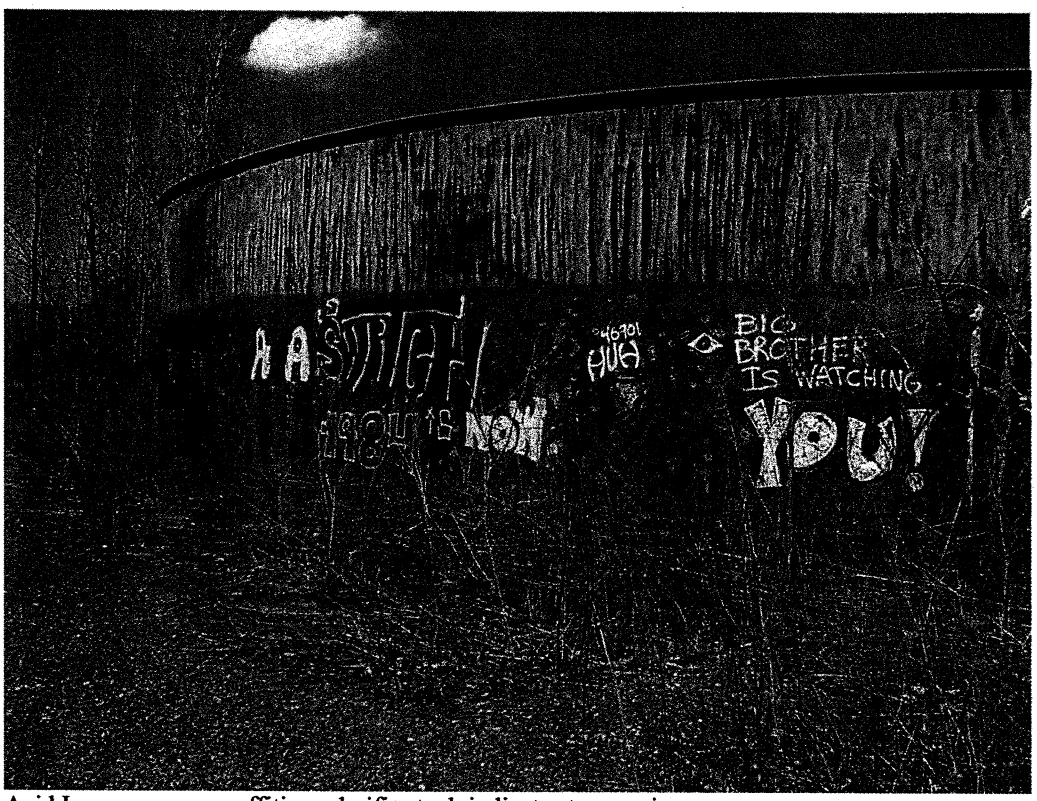




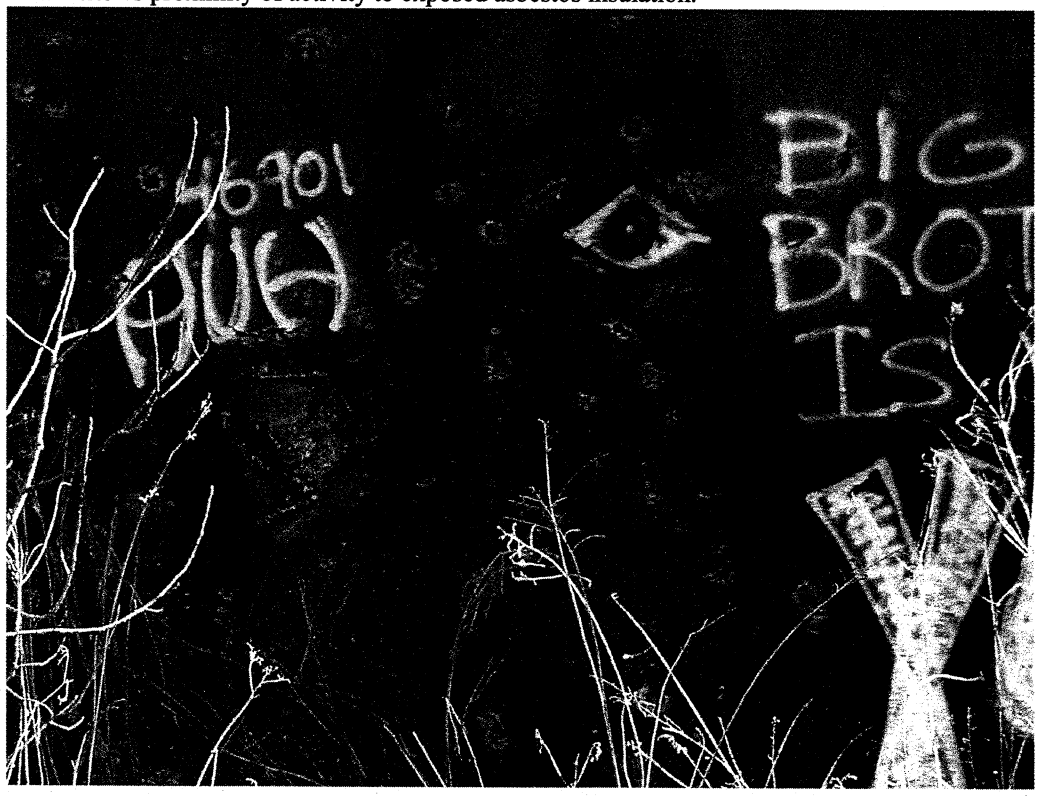
Main Plant - graffiti on east wall inside site indicates recent trespassing.

Main Plant - covered oil pit.

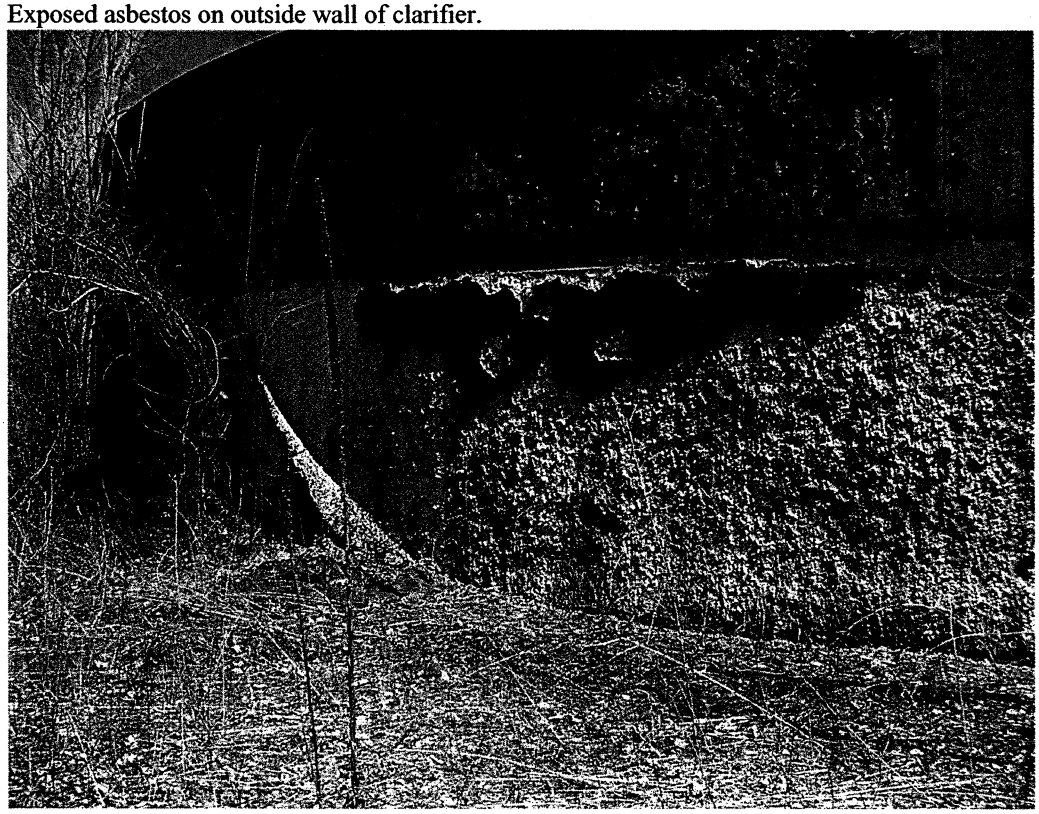




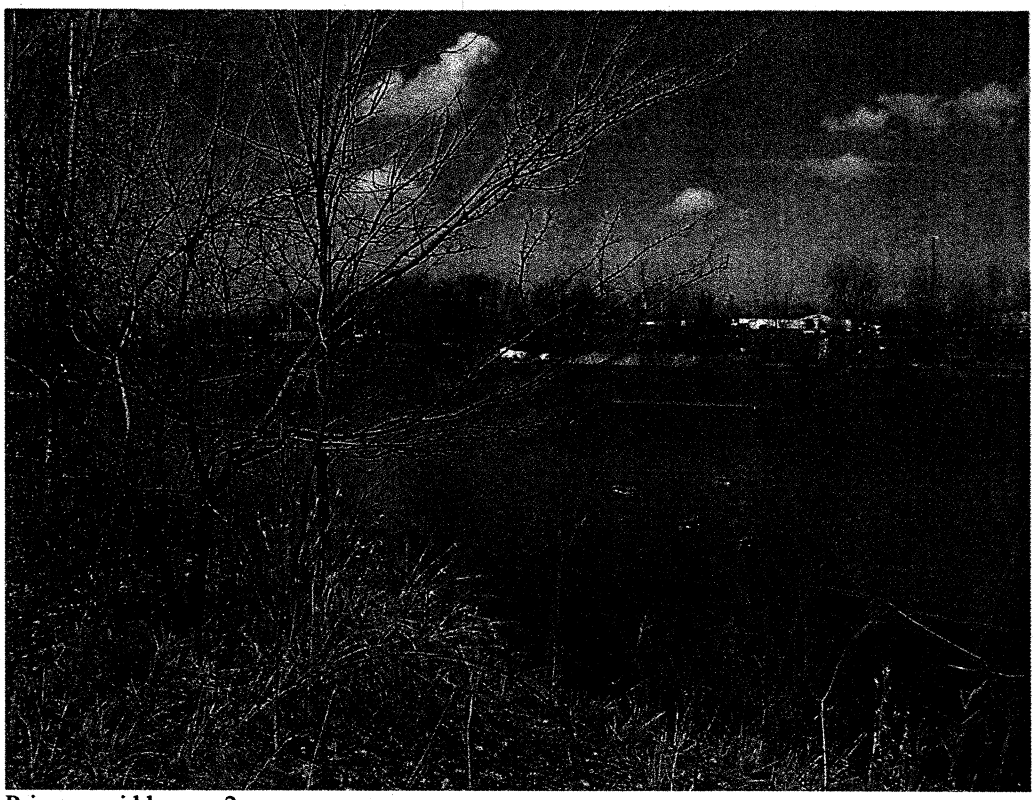
Acid Lagoon area - graffiti on clarifier tank indicates trespassing.
Detail shows proximity of activity to exposed asbestos insulation.



Acid Lagoon area - Graffiti inside clarifier.
Exposed asbestos on outside wall of clarifier.

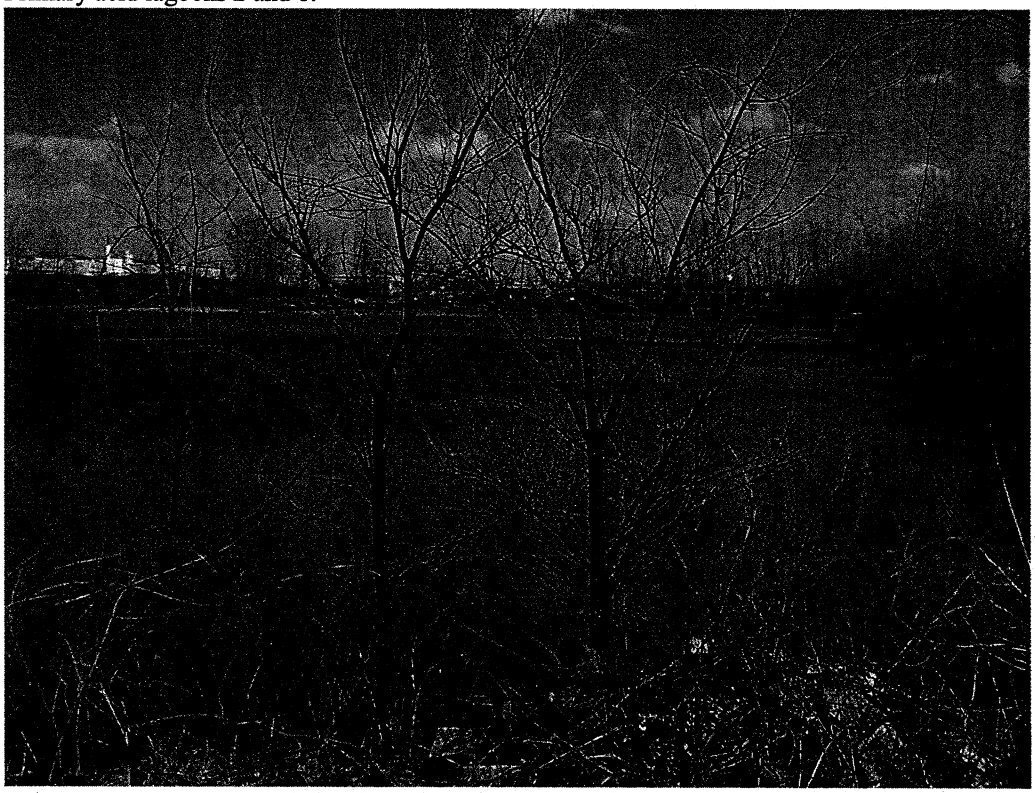


Acid Lagoon area - Graffiti on walls of dilapidated former wastewater treatment plant.



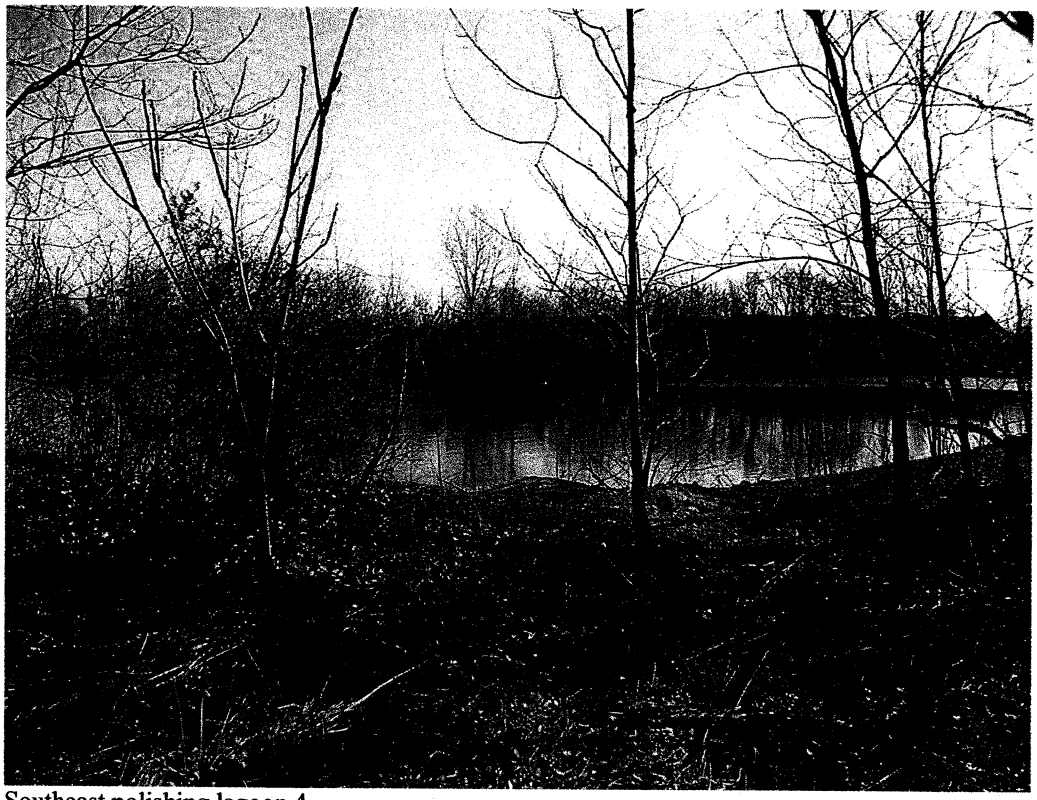
Primary acid lagoon 2.

Primary acid lagoons 2 and 1.



Northeast polishing lagoon 6

Northwest polishing lagoon 3.



Southeast polishing lagoon 4.
Southwest polishing lagoon 7.

Final polishing lagoon 5.

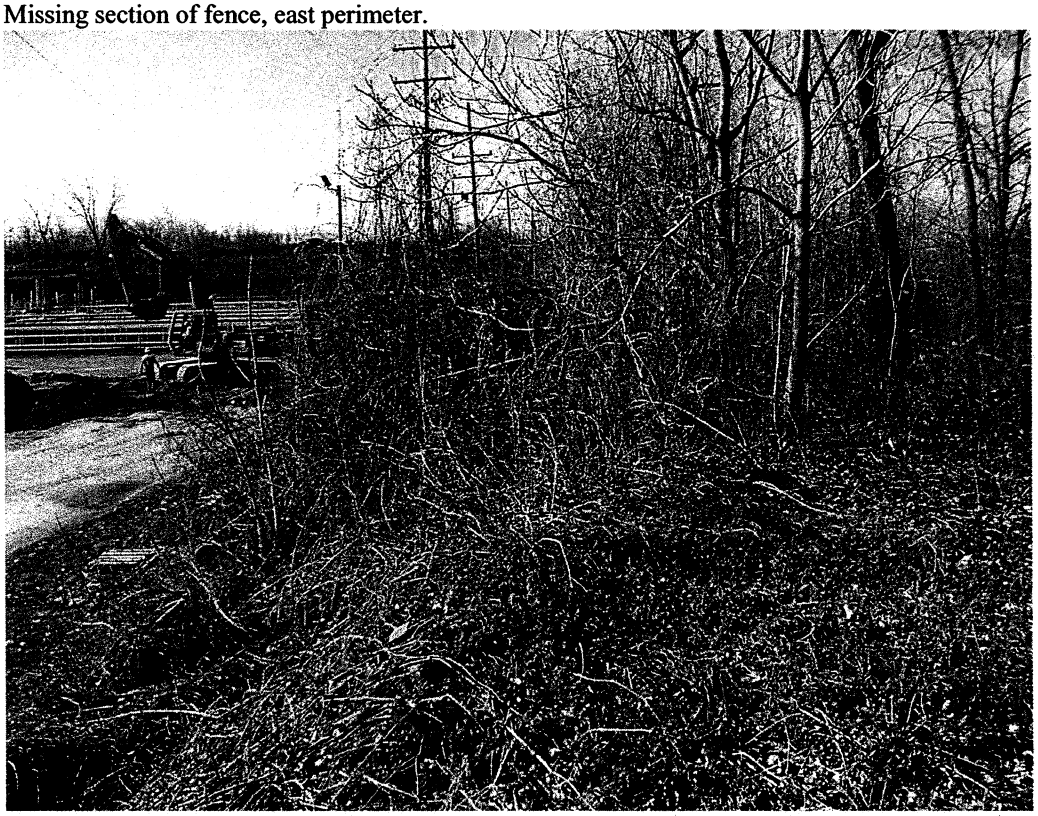
Final polishing lagoon 5, NPDES discharge point.

Northeast sludge drying bed 10.
North central sludge drying bed 9.

Northwest sludge drying bed 8.

Gaps in fenceline, east perimeter.

Missing section of fence, east perimeter.



Fence damage at northeast fenceline. Trespasser access appears to come from this area.

Fence damage at southeast fenceline, Kokomo compost operation covers fence.

APPENDIX A - 1998 RECORD OF DECISION ARARS

This section presents a summary of those federal regulations which may be found to be applicable or relevant and appropriate to the CSSS, specifically:

- CERCLA, including the Superfund Amendments and Reauthorization Act (SARA) of 1986 and subsequent amendments;
- RCRA, including the Hazardous and Solid Waste Act Amendments of 1984 (HSWA);
- The Toxic Substances Control Act (TSCA);
- The Clean Water Act (CWA) and Amendments;
- The Safe Drinking Water Act (SDWA);
- The Clean Air Act (CAA);
- The Protection of Wetlands/Flood Plains Management Executive Order; and
- The Hazardous Materials Transportation Act.

The Comprehensive Environmental Response, Compensation, and Liability Act

CERCLA, last amended in October 1992, provides the U.S. EPA Administrator the authority to respond to any past disposal of hazardous substances and any new uncontrolled releases of hazardous substances. Within CERCLA, a trust fund has been established for clean-up of abandoned past disposal sites and leaking underground storage facilities, as well as the authority to bring civil actions against violators of this act. The National Contingency Plan (NCP), which guides clean-up actions at Superfund sites, was developed subject to this act.

The Superfund Amendments and Reauthorization Act (SARA) of 1986 extensively amends CERCLA. The major goals of SARA were to include more public participation, and to establish more consideration of State clean-up standards, with an emphasis on achieving remedies that permanently and significantly reduce the mobility, toxicity, or volume of wastes.

The Resource Conservation and Recovery Act

RCRA regulates the management and land disposal of hazardous waste and solid waste material and the recovery of materials and energy resources from the waste stream. RCRA regulates the generation, transportation, treatment, storage, and disposal of hazardous wastes, as well as solid waste disposal facilities. RCRA applies to remedial actions selected that include disposal, treatment, storage, or transportation of regulated wastes. Remedies that include on site disposal of hazardous wastes will be required to meet RCRA design, monitoring, performance and closure standards. Off-site transportation of regulated wastes, whether as part of a remedial action or as generated during the investigation, will require use of the manifest system, a RCRA-licensed transporter, and proof of acceptance at a licensed facility approved for the particular wastes.

The Hazardous and Solid Waste Act Amendments (HSWA) of 1984 impose new and more stringent requirements on hazardous waste generators, transporters, and owner/operators of treatment, storage, and

disposal facilities. Land disposal restrictions, as described in 40 CFR 268, identify hazardous wastes that are restricted from land disposal and define those limited circumstances under which an otherwise prohibited waste may continue to be land disposed.

For the CSSS, the lagoons are RCRA surface impoundments. Therefore, closure of the lagoons should consider these design requirements.

The Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) regulates the remediation of soils contaminated with polychlorinated biphenyls (PCBs) under 40 CFR 761.125(c)(4). TSCA requires that material contaminated with PCBs at concentrations of 500 mg/kg or greater be incinerated or treated by an alternate method that achieves a level of performance equivalent to incineration. Alternate treatments other than incineration must achieve a waste soil residual concentration of less than two mg/kg. Liquids at concentrations above 50 mg/l but less than 500 mg/l and soils contaminated above 50 mg/kg may also be disposed of in a permitted chemical waste landfill. In addition, TSCA storage requirements for PCB materials with PCB concentrations of 50 mg/kg or greater prior to disposal would be applicable. Soils contaminated with PCBs in human exposure areas are to be treated or removed such that the PCB concentration in the upper 10 inches of soil is less than one mg/kg, and the concentration below 10 inches is less than 10 mg/kg.

U.S. EPA issued a proposed rule on December 6, 1994 regarding the disposal of PCBs. This proposed rule provides for disposal of non-liquid PCB remediation waste generated by the clean-up process at their existing concentration (i.e., at a concentration less than the maximum concentration of PCBs found at the remediation waste site). The proposed regulations also provide for a risk-based remediation option which bases disposal requirements for PCB remediation waste on the potential risks to health and the environment resulting from residual PCBs in the PCB-remediation waste.

The Clean Water Act

The Federal Water Pollution Control Act, amended by the Clean Water Act of 1977, was last amended October 1992, and is commonly referred to as the Clean Water Act (CWA). Federal Ambient Water Quality Criteria documents have been published for 65 priority pollutants listed as toxic under the CWA. These criteria are guidelines that may be used by states to set surface water quality standards. Although these criteria were intended to represent a reasonable estimate of pollutant concentrations consistent with the maintenance of designated water uses, states may appropriately modify these values to reflect local conditions. Under SARA, however, remedial actions must attain a level or standard of control that will result in surface water conditions equivalent to these criteria unless a waiver has been granted.

The water quality criteria are generally represented in categories that are aligned with different surface water use designations. These criteria represent concentrations that, if not exceeded in surface water, should protect most aquatic life against acute or chronic toxicity. For many chemical compounds, specific criteria have not been established because of insufficient data. The criteria are used to calculate appropriate limitations for discharges to surface water. These limitations are incorporated in the National Pollutant Discharge Elimination System (NPDES) permits.

The provisions of the CWA are potentially applicable to uncontrolled landfill leachate and groundwater discharges to surface water bodies and to remedial actions that include a discharge of treated water to surface water.

The Safe Drinking Water Act

The Safe Drinking Water Act of 1974 (SDWA), regulates the quality of water collected, distributed, or sold for drinking purposes. Standards are set for maximum contaminant levels (MCLs) permissible in water delivered to any user of public drinking water. The SDWA also has been broadened to protect groundwater and public drinking water supplies against contamination.

National primary drinking water standards established under the SDWA are promulgated as MCLs that represent the maximum allowable levels of specific contaminants in public water systems. MCLs are generally based on lifetime exposure to the contaminant for a 70 kg (154 pound) adult who consumes two liters (0.53 gallons) of water per day.

The SDWA provides for primary drinking water regulations to be established for maximum contaminant level goals (MCLGs), with MCLs as close to MCLGs as feasible. MCLGs are non-enforceable health goals at which no known or anticipated adverse effects on the health of persons would be expected to occur, thus allowing an adequate margin of safety. MCLGs only serve as goals for U.S. EPA in the course of setting MCLs and, therefore, are initial steps in the MCL rule-making process.

MCLs and MCLGs for contaminants of concern at the CSSS were established in the final Risk Assessment (CDM, 1996).

The Clean Air Act

The Clean Air Act (CAA), with amendments through December 1991, was enacted to protect and enhance the quality of air resources to protect the public health and welfare. The CAA is intended to initiate and accelerate national research and development programs to achieve the prevention and control of air pollution. Under the CAA, the Federal Agencies are to provide technical and financial assistance to state and local governments for the development and execution of their air pollution programs. The U.S. EPA is the administrator of the Act and is given the responsibility to meet the objectives of the Act. The Act establishes emission levels for certain hazardous air pollutants that result from treatment processes.

Requirements of the CAA are potentially applicable to remedial actions that result in air emissions, such as excavation and treatment activities.

The Protection of Wetlands/Flood Plain Management Executive Order

Executive Order 11990 requires Federal agencies in carrying out their responsibilities, to take action to minimize the destruction, loss, or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands. The order emphasizes the importance of the initiation of new construction located in wetlands unless there is no practicable alternative to that construction. The order also emphasizes minimizing the harm to the wetlands if the only practicable alternative requires construction in the wetland. The order requires that federal agencies provide early and adequate opportunities for public review of plans and proposals involving new construction in wetlands.
Executive Order 11988 requires federal agencies carrying out their responsibilities to take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health and welfare, and to restore and preserve the natural and beneficial values served by flood plains. This order emphasizes the importance of evaluating alternatives to avoid adverse effects and incompatible development in flood plains, minimizing the potential harm to flood plains if the only practicable alternative requires siting an action in a flood plain, and providing early and adequate opportunities for public review of plans and proposals involving action in flood plains such as the Acid Lagoon area.

Appendix A of 40 CFR Part 6 describes the requirements for flood plain/wetlands review of proposed U.S. EPA actions. These regulations are potentially applicable for work to be done in the creeks or other wetland areas, and for remedial activities within the flood plain, such as the Acid Lagoon area.

The Hazardous Materials Transportation Act

The Hazardous Materials Transportation Act (HMTA) of 1981, as amended, was enacted to regulate the shipping, marking, labeling, and placarding of hazardous materials that are transported on public roadways. Pursuant to the HMTA, the Department of Transportation (DOT) has promulgated regulations pertaining to transportation of hazardous materials. DOT also has jurisdiction over the packaging of hazardous materials prior to shipment.

Hazardous soils, residues, wastewaters, or wastes that are transported off-site from the CSSS will be handled according to HMTA and DOT regulations.

Identification of Potential State ARARs for the CSSS

The purpose of this section is to identify ARARs that exist based on Indiana state regulations that must be complied with when performing a remedial action. The agency charged with developing and enforcing environmental regulations for Indiana is the IDEM.

Indiana Water Quality Standards (IAC Title 327)

These regulations pertain to all waters in the state and are intended to restore and maintain the chemical, physical, and biological integrity of the waters of the state. The regulations include:

- Specific water quality standards and minimum treatment requirements that apply to all waters of the state. These include minimum surface water quality standards and interim groundwater quality standards;
- Regulations applying to industrial wastewater programs (NPDES);
- Regulations applying to municipal wastewater treatment facilities;
- Regulations applying to industrial wastewater discharges into sewage treatment plants; and

I. Water quality standards for water distributed through public water supply systems.

The procedures for developing water quality criteria based on toxicity are included in IAC Title 327, as are procedures for evaluating the characteristics of receiving waters. These procedures are used to determine discharge concentrations which if not exceeded will maintain the quality of the receiving waters.

Indiana Solid Waste Management Board Rules (IAC Title 329)

These regulations specify requirements that apply to solid waste and hazardous waste facilities. These include Solid Waste Management Requirements, Hazardous Waste Management Permit Program and Related Hazardous Waste Management Requirements, PCB Waste Management Requirements. The solid waste regulations include design and disposal regulations as well as monitoring requirements and standards for groundwater protection applicable to solid waste land disposal facilities. The hazardous waste regulations were developed pursuant to the requirements of RCRA and pertain to generators and transporters of hazardous waste and owners or operators of hazardous waste facilities. The PCB waste management requirements were developed based on the requirements of TSCA and pertain to the handling and disposal of PCB containing wastes which exceed 50 ppm, and in certain cases, regulate PCBs at concentrations between 2 ppm and 50 ppm.

Indiana Air Pollution Control Regulations (IAC Title 326)

The Indiana air pollution control regulations were developed pursuant to the Federal CAA. The regulations contain specific emission levels and requirements for monitoring emissions. They contain requirements for specific types of operations (such as burning) and for types of industry. There are also specific emissions standards for hazardous air pollutants.

Chemical-Specific Requirements

Federal

(1)Clean Air Act (42 USC 7401 et seq.), National Primary and Secondary Ambient Air Quality Standards (40 CFR 50) [U.S. EPA regulations on National Primary and Secondary Ambient Air Quality Standards].

(2)Clean Air Act (42 USC 7401 et seq.), National Emission Standards for Hazardous AirPollutants (40 CFR 61), Subpart M, National Emission Standards for Asbestos. [Standards for demolition and renovation, asbestos waste disposal].

(3)Clean Water Act (33 USC 1251, et seq.), Water Quality Standards (40 CFR 131) [U.S. EPA regulations on establishing water quality standards].

(4)Safe Drinking Water Act (42 USC 300f, et seq.), Maximum Contaminant Levels (40 CFR 141.11 - 141.16) [Sets standards for contaminants in public drinking water supplies].

(5)Solid Waste Disposal Act, as amended (42 USC 6901, et seq.), Land Disposal Restrictions (40 CFR 268) Subpart D, Treatment Standards [Sets the treatment standards for waste extract, specified technology, hazardous waste debris].